

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE**

ARTIS WHITEHEAD

Plaintiff,

V.

CITY OF MEMPHIS, JAMES HOWELL,  
TERRY LYONS, ROBERT RAGLAND,  
JOSEPH PEARLMAN, VIVIAN MURRAY,  
THOMAS WARRICK, TIMOTHY GREEN,  
EDWARD BASS, ROBERT HULL, JR.,  
JAMES BOLDEN, and UNKNOWN  
EMPLOYEES OF THE CITY OF MEMPHIS,

Defendants.

CASE NO. 2:24-CV-02991  
JURY DEMAND

**DEFENDANT JAMES BOLDEN’S MOTION TO DISMISS FOR FAILURE TO  
STATE A CLAIM**

Defendant James Bolden (“Defendant Bolden”) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, hereby moves to dismiss Plaintiff Artis Whitehead’s Complaint for failure to state a claim upon which relief can be granted. In support of his Motion, Defendant Bolden relies on his accompanying Memorandum in Support.

**Respectfully submitted,**

**BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.**

*s/ Bruce McMullen*

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*Attorneys for Defendant City of Memphis  
and Defendants Thomas Warrick, James  
Howell, Robert Ragland, Edward Bass, and  
James Bolden*

**CERTIFICATE OF SERVICE**

I, Bruce McMullen, hereby certify that on April 1, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, and that upon filing, such system will serve a copy of the foregoing upon all counsel of record in this action.

s/ Bruce McMullen  
Bruce McMullen